

Approved: _____

MARGUERITE B. COLSON

KEVIN B. MEAD

Assistant United States Attorneys

Before: THE HONORABLE GABRIEL W. GORENSTEIN

United States Magistrate Judge

Southern District of New York

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UNITED STATES OF AMERICA

- v. -

CHRIS ULZHEIMER,

Defendant.

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SEALED COMPLAINT

Violations of 26 U.S.C.

§ 5861(d); 18 U.S.C.

§ 922(k)

COUNTY OF OFFENSES:

BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

KELVIN JACKSON, being duly sworn, deposes and says that he is a Special Agent with the United States Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"), and charges as follows:

COUNT ONE

(Possession of a Firearm with an Obliterated Serial Number)

1. On or about February 24, 2022, in the Southern District of New York, CHRISTOPHER P. ULZHEIMER, the defendant, knowingly possessed a firearm, that is a Colt 380 semiautomatic pistol, that had been shipped and transported in interstate commerce, from which the manufacturer's serial number had been removed, altered and obliterated, in violation of Title 18, United States Code, Sections 922(k) and 924(a) (1) (B).

(Title 18, United States Code, Sections 922(k) and 924(a))

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COUNT TWO

(Possession of an Unregistered Firearm)

2. On or about February 24, 2022, in the Southern District of New York, the defendant, CHRISTOPHER P. ULZHEIMER, knowingly received and possessed a firearm, to wit, a Model JT-15, AR-type semiautomatic rifle having a barrel of less than 16 inches in length, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

(Title 26, United States Code, Section 5861(d))

The bases for my knowledge and for the foregoing charges are, in part, as follows:

3. I have been a Special Agent with the ATF for approximately seven years. I have been involved in the investigation of this matter, and I base this affidavit on that experience, as well as on my conversations with other law enforcement agents, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. Based on my review of property records and my personal observations I know the following:

a. 1643-1645 Radcliff Avenue in the Bronx, New York is a single property lot owned by CHRISTOPHER P. ULZHEIMER, the defendant.

b. The single property lot contains adjoining homes with respective addresses of 1643 Radcliff Avenue and 1645 Radcliff Avenue.

5. Based on my review of records of an online retailer of firearm parts and accessories (the "Retailer") and my

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conversations with law enforcement officers, I have learned the following:

a. Since in or about November 2017 through in or about October 2020, CHRISTOPHER P. ULZHEIMER, the defendant, has placed approximately 13 orders from the Retailer of Glock parts and accessories.

b. All but one of the orders listed a billing and shipping address of 1643 Radcliff Avenue.

c. Between in or about October 2018 and in or about September 2020, ULZHEIMER purchased five identical pistol kits containing parts to construct five identical Glock pistols. Each of the pistol kits was shipped to ULZHEIMER at 1643 Radcliff Avenue.

6. Based on my participation in this investigation, as well as my conversations with other law enforcement officers, I have learned the following:

a. On or about February 24, 2022, law enforcement officers conducted a judicially authorized search of 1643 Radcliff Avenue and 1645 Radcliff Avenue, where they located, among other

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things, various firearms and firearm accessories as depicted below:



b. Specifically, law enforcement located, among other items:

i. Approximately seven rifles, including a Model JT-15, AR-type semiautomatic rifle having a barrel of less than 16 inches, as seen below:

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ii. Approximately five pistols, including a Colt 380 semiautomatic pistol from which the manufacturer's serial number had been obliterated, as depicted below;

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- iii. Approximately one revolver;
- iv. Various firearm parts and accessories;
- v. Body armor; and
- vi. Several rounds ammunition, including 50-caliber ammunition.

7. Based on my training and experience, my conversations with other law enforcement officers, and my review of law enforcement databases, I know that a rifle having a barrel of less than 16 inches, *i.e.*, a "short-barreled rifle" is a "firearm" as defined in 26 U.S.C. § 5845(a). Further, I know that CHRISTOPHER P. ULZHEIMER, the defendant, does not have a short-barreled rifle registered to him in the National Firearms Registration and Transfer Record.

8. Based on my training and experience, and my communications with other law enforcement agents, including a Special Agent from ATF who is familiar with the manufacturing of

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firearms and ammunition, I have learned that the Colt 380 semiautomatic pistol from which the manufacturer's serial number had been obliterated, found inside of 1643 Radcliff Avenue, was not manufactured in New York State.

WHEREFORE, deponent respectfully requests that a warrant issue for the arrest of CHRISTOPHER P. ULZHEIMER, the defendant, and that he be arrested and imprisoned, or bailed, as the case may be.

sworn electronically

Kelvin Jackson
Special Agent
Bureau of Alcohol, Tobacco,
Firearms, and Explosives

Sworn to me through the transmission
of this Affidavit by reliable electronic
means (telephonic conference), pursuant
to Federal Rules of Criminal Procedure 41(d)(3)
and 4.1 this,

24th
— day of February, 2022



THE HONORABLE GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK